

HARRIS
ST. LAURENT

June 17, 2020

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated June 5, 2020 (Docket No. 64), I write to update the Court regarding Mr. Lawrence's efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Mr. Lawrence has spoken to at least three individuals at this time, but he has not yet secured a third co-signer. He continues to use his best efforts to do so.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to a two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than July 1st.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)